

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
Estate of Esther Klieman, <i>et al.</i> ,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 04-1173 (PLF) (JMF)
)	
The Palestinian Authority, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF RICHARD D. HEIDEMAN

I, Richard D. Heideman, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed in the District of Columbia and the states of Maryland, Indiana, Kentucky and Wyoming.
2. I am Senior Counsel at Heideman Nudelman & Kalik, P.C. and lead counsel for the Plaintiffs in the above-captioned pending action.
3. On or about February 2011, I met with Zakaria Zubeidi, in Jenin at the Freedom Theatre regarding the matter of the murder of Esther Klieman, the decedent in the within action.
4. At the time, Mr. Zubeidi advised me, *inter alia*, that:
 - The Al Aqsa Martyrs Brigade existed in 2002, including at the time of the murder of Esther Klieman.
 - He served as the head of the Al Aqsa Martyrs Brigade in Jenin.
 - The Al Aqsa Martyrs Brigade had letterhead stationery which included the names and/or symbols of the Al Aqsa Martyrs Brigade, Fatah and references to the Palestinian Authority and/or the Palestine Liberation Organization.

- He had a copy of said stationery.
 - He was aware that the Al Aqsa Martyrs Brigade shooter, Tamer Rimawi was imprisoned as a result of the shooting of Esther Klieman.
 - The Al Aqsa Martyrs Brigade was and is a part of Fatah which was and is a part of the PA and PLO.
 - The Al Aqsa Martyrs Brigade exists today.
5. Zakaria Zubeidi refused to confirm anything in writing or otherwise be recorded during the meeting and was surrounded by people who I believe were armed men.
6. Mr. Zubeidi abruptly ended the meeting at which time he threatened me and those who accompanied me to the meeting by saying that I had to leave immediately and to never come back.
7. I believe that the threat was sincere and have no other way from any other source of confirming Zakaria Zubeidi's statements or those of Ata Abu Rumaileh contained in the British Broadcasting Corporation's ("BBC") "Arafat's Investigated" documentary dated or aired by the BBC on or about November 9, 2003 at 19:15 GMT on BBC Two other than by issuing the relevant pending subpoena to the BBC.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

November 30, 2011


Richard D. Heideman